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December 9, 2019

By ECF

Hon. Paul G. Gardephe United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 MEMO ENDORSED

The Application is granted.

SO ORDERED:

Re: United States v. Tara Rose

19 Cr 789 (PGG)

Paul G. Gardephe, U.S.D.J.

Dear Judge Gardephe:

I am the attorney for Tara Rose. I write with the consent of the Government seeking to clarify that should the Court grant Mr. Rose's application to amend his bail conditions pursuant to his application (ECF # 146, filed 12/9/19) that Ms. Rose would now be permitted to reside with her husband and co-defendant, Anthony Rose.

Earlier today counsel for Mr. Rose wrote the Court requesting that the Court amend the terms and conditions of his bail and allow him "to have contact with his wife unrelated to this case and without counsel present." The Government did not oppose the application.

I write seeking to clarify that if the Court were to grant Mr. Rose's application, that Tara Rose would now be permitted to reside with her husband, Anthony.

I spoke with AUSA Andrews and the Government does not oppose this request/clarification.

As background, Ms. Rose recently suffered a stroke. She remains under doctor's care, continues to require physical therapy and she is the primary caregiver for her two children, ages 12 and 17. Prior to their arrests in this case, Mr. Rose was helping Tara raise her children.

Accordingly, if the foregoing meets with Your Honor's approval, then I respectfully request that Your Honor grant this application/clarification and "So Order"

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this letter, indicating that Ms. Rose is permitted to reside with her husband, Anthony, and they are permitted to have contact unrelated to this case without counsel present.

Thank you for your consideration in this matter.

Very truly yours,

Daniel S. Parker

cc: All parties by ECF